

DECLARATION OF KERI FITZPATRICK

I, Keri Fitzpatrick, declare and state as follows:

- I am a Regional Environmental Manager and am employed by Schnitzer Steel Industries, Inc. ("Schnitzer Steel"). Part of my job function involves management of large capital projects. This declaration is based on my personal knowledge, or where I do not have personal knowledge, on the basis of information and belief. If called as a witness I could and would testify competently to such matters.
- I have a Bachelor of Science Degree in Environmental Science from the University of Massachusetts at Amherst and a Certificate in Environmental and Regulatory Management from Northeastern University.
- 3. Since being employed by Schnitzer Steel in 2007, I have managed numerous civil engineering and environmental improvement projects. These projects have included installation of retaining walls, replacement of catch basin structures, utility installations and repairs, foundations for temporary and permanent buildings, automotive processing facilities, concrete operating pads, canopy structures, water storage tanks, stormwater retention ponds, stormwater electrocoagulation treatment system, sand filtration systems and an air pollution control equipment system. Project management of these capital expenditures included design, permitting, installation and budget management. Prior to working at Schnitzer, I managed several civil engineering and groundwater remediation projects as a Senior Project Manager for Groundwater and Environmental Services (1999-2007). These projects included gas station demolition and renovation projects, petroleum tank removals, soil remediation excavations, utility removals and replacements, and installation of soil and groundwater treatment systems.
- 4. I currently report to Scott Sloan, Vice President, Corporate Environmental, through Jose Cedeno, Senior Environmental Manager East Region. At Mr. Sloan's request, I have been supporting Peter Wold of Parsons Corporation in connection with his work on the engineering design and installation of Regenerative Thermal Oxidizers (RTOs) and acid gas scrubbers proposed for Schnitzer Steel's metal recycling facility in Oakland, California. It is my

The declaration above is true and correct and signed under penalty of perjury under the Kulty 4817-9131-4094 ED_013190A 00000084-00002

Exhibit A

CONFIDENTIAL BUSINESS INFORMATION - DO NOT DISCLOSE

Ex. 4 CBI